

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JUSTIN SHERWOOD,

Plaintiff,

-v-

THE CITY OF NEW YORK, et al.,

Defendants.

DECLARATION OF GIDEON
ORION OLIVER IN
OPPOSITION TO
DEFENDANTS' PARTIAL
MOTION TO DISMISS

22-cv-7505 (BMC)

GIDEON ORION OLIVER, an attorney duly admitted to practice before this Court, hereby declares under penalties of perjury that the following statements are true and correct:

1. I am co-counsel for Plaintiff Justin Sherwood in this action.
2. I make this Declaration in support of Plaintiff's opposition to Defendants' motion to dismiss the First Amended Complaint (the "FAC", ECF 26) in this matter, to provide the Court with copies of the documents referred to and/or incorporate by reference in the FAC.
3. Attached as Exhibit 1 is a true copy of the StreetsblogNYC article referred to in ¶ 67 of the FAC, *BAD COP, BAD COP: NYPD Threatens Tipster for Filing 311 Complaints About Illegal Parking*, Oct. 2021, available at <https://nyc.streetsblog.org/2021/10/18/bad-cop-bad-cop-nypd-threatens-tipster-for-filing-311-complaints-about-illegal-parking/> (last accessed March 13, 2023).
4. Attached as Exhibit 2 is a true copy of the StreetsblogNYC article referred to in ¶ 103 of the FAC, *AWFULLY IRONIC: NYPD Threatens Tipster After Streetsblog Story About Prior Harassment Over 311 Complaints About Illegal Parking*, Oct. 2021, available at <https://nyc.streetsblog.org/2021/10/19/irony-alert-nypd-threatens-tipster-after-streetsblog-story-about-prior-harassment-over-311-complaints-about-illegal-parking/> (last accessed March 13, 2023).
5. Attached as Exhibit 3 is a true copy of the StreetsblogNYC article referred to in ¶ 125 of the FAC, *IGNORED, DISMISSED: How the NYPD Neglects 311 Complaints about Driver*

Misconduct, Oct. 2021, available at <https://nyc.streetsblog.org/2021/10/21/ignored-dismissed-how-the-nypd-neglects-311-complaints-about-driver-misconduct/> (last accessed March 13, 2023).

6. Attached as Exhibit 4 is a true copy of the StreetsblogNYC article referred to in ¶ 128 of the FAC, *Council Member Calls For Probe of Alleged 311 Harassment As Colleague Calls Dead-of-Night Calls from Cops 'Inappropriate'*, Oct. 2021, available at <https://nyc.streetsblog.org/2021/10/26/council-member-calls-for-probe-of-alleged-311-harassment-as-colleague-reveals-dead-of-night-calls-from-cops/> (last accessed March 13, 2023).

7. Attached as Exhibit 5 is a true copy of the StreetsblogNYC article referred to in ¶ 130 of the FAC, *Amid Multiple Investigations, NYPD Defends Its 311 Response at Council Hearing*, Oct. 2021, available at <https://nyc.streetsblog.org/2021/10/27/amid-multiple-investigations-nypd-defends-its-311-response-at-council-hearing/> (last accessed March 13, 2023).

8. Attached as Exhibit 6 is a true copy of the StreetsblogNYC article referred to in ¶ 132 of the FAC, *Mayor Vows to Investigate Alleged Harassment of 311 Users After Recent Streetsblog Investigation*, Oct. 2021, available at <https://nyc.streetsblog.org/2021/10/28/mayor-vows-to-investigate-alleged-harassment-of-311-users-after-recent-streetsblog-investigation/> (last accessed March 13, 2023).

9. Attached as Exhibit 7 is a true copy of the Atlantic article referred to in ¶ 133 of the FAC, *The Lawlessness that Cops Ignore*, Dec. 2021, available at <https://www.theatlantic.com/ideas/archive/2021/12/cops-311-broken-windows-unaccountable/621022/> (last accessed March 13, 2023).

10. Attached as Exhibit 8 is a true copy of the StreetsblogNYC article referred to in ¶ 134 of the FAC, *NYPD Ignores Council Request for Info on Allegedly Fraudulent 311 Response*, Oct. 2021, available at <https://nyc.streetsblog.org/2021/10/25/nypd-ignores-council-request-for-info-on-apparently-fraudulent-311-responses/> (last accessed March 13, 2023).

11. Attached as Exhibit 9 is a true copy of the StreetsblogNYC article referred to ¶ 138 of the FAC, *City Investigating NYPD 311 Harassment Allegations After Streetsblog Report*, Dec. 2021, available at <https://nyc.streetsblog.org/2021/12/21/city-investigating-nypd-311-harassment-allegations-after-streetsblog-report/> (last accessed March 13, 2023).

12. Attached as Exhibit 10 is a true copy of the StreetsblogNYC article referred to in ¶ 141 of the FAC, *Death Threats Follow Brooklyn Man's Illegal Parking Complaints to 311 and the NYPD*, Feb. 2022, available at <https://nyc.streetsblog.org/2022/02/09/death-threats-follow-brooklyn-mans-illegal-parking-complaints-to-311-and-the-nypd/> (last accessed March 13, 2023).

Dated: Brooklyn, New York
March 13, 2023


